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9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 Frescia Anthuane GARRO PINCHI,

13 Petitioner,

14 v.

15 POLLY KAISER, Acting Field Office Director
of the San Francisco Immigration and Customs
16 Enforcement Office; TODD LYONS, Acting
Director of United States Immigration and
17 Customs Enforcement; KRISTI NOEM,
Secretary of the United States Department of
18 Homeland Security, PAMELA BONDI,
Attorney General of the United States, acting in
19 their official capacities,

20 Respondents.
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CASE NO. 25-cv-05632

**DECLARATION OF MATTHEW
BRIDGES**

1 I, Matthew Bridges, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as
2 follows:
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4 1. I have personal knowledge of the facts stated in this declaration and, if called as a
5 witness, could testify truthfully to those facts. Where I do not have personal knowledge, I
6 believe and am informed for the following information to be true.
7

8 2. I, alongside Ms. Ariel Koren, accompanied the Petitioner in this case, Ms. Frescia
9 Anthuane Garro Pinchi, to her second Immigration Court hearing with IJ Patrick O'Brien on
10 July 3, 2025. This hearing took place in Courtroom 3, on the 4th floor of 630 Sansome St., San
11 Francisco, California.

12 3. I was present in the courtroom when the government attorney moved to dismiss
13 the case of Ms. Garro Pinchi. I witnessed her express verbal opposition to the motion to
14 dismiss her case in front of the judge, citing fear of returning to her country of origin, Peru.
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16 4. The government gave no reason for the dismissal, and the judge provided Ms.
17 Garro Pinchi with a continuance to July 31, 2025, to present evidence as to why her case
18 should not be dismissed. The Judge made comments alluding to the likelihood of her detention,
19 stating that she would probably not be able to attend the continued hearing in his courtroom.

20 5. I witnessed Ms. Garro Pinchi, along with another female respondent from
21 courtroom 3, as they were violently detained in the 4th floor hallway of the courtroom by
22 approximately five ICE agents despite both of their cases being continued by the judge.
23

24 6. ICE agents did not present warrants for arrest of either individual, nor did they
25 provide any explanation for why they were each being arrested. During the arrest I told the ICE
26 officials that both respondents had pending asylum applications on file and were each issued
27 continuances by the Judge.
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1 7. ICE agents stated to me that this was a “normal” process, before taking both Ms.
2 Garro Pinchi and the other woman to the 6th floor for processing.

3 8. In the hours that followed, I witnessed repeated instances of ICE interfering with
4 Ms. Garro Pinchi and the other detainee’s access to their legal counsel. With respect to Ms.
5 Garro Pinchi, I witnessed the following:

- 6 a. ICE officers refused to provide contact information for Ms. Garro Pinchi’s
7 specific deportation officer despite multiple requests by myself and Ms. Koren.
8 b. ICE officers refused to provide a direct phone number to Ms. Garro Pinchi’s
9 counsel, Ms. Abby Sullivan Engen, in order for Ms. Sullivan Engen to speak
10 directly with ICE officials overseeing her detention.
11 c. Despite knowing we were on the phone with Ms. Garro Pinchi’s attorney, ICE
12 officers refused to provide details to myself or Ms. Koren regarding her location
13 or whether she would be transferred to a detention facility.
14 d. Ms. Garro Pinchi told Ms. Koren and me that she was forced to sign a document
15 she understood to be related to requesting bond, without being provided a written
16 translation of the document. She asked to speak with her lawyer before signing,
17 but according to Ms. Garro Pinchi, the officers persisted and forced her to sign.¹
18

19 9. Because of ICE’s refusal to allow Ms. Garro Pinchi a phone call with her
20 attorney, Ms. Koren called Ms. Sullivan Engen from the visitation room.
21

22 10. I was able to access a printer at a business nearby, and when I returned I presented
23 Ms. Sullivan Engen’s Form G-28, Notice of Entry of Appearance, along with her request to
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28 ¹ Over the course of the day I had the opportunity to speak to the other detainee as well. This
detainee told me the same thing: that she had been forced to sign a document in English, without
the opportunity to speak with a lawyer.

1 release Ms. Garro Pinchi. I presented these documents to an ICE officer whom I recognized as
2 one of the officers who conducted arrests that morning in the 4th floor hallway.

3 11. The officer appeared reluctant to receive the documents and signaled that he
4 would not afford them any serious consideration. To paraphrase, when I told him that Ms.
5 Garro Pinchi was filing a petition in federal court, and that she should not be transferred out of
6 San Francisco, he stated that was “not our responsibility.”

7 12. At approximately 2:30 PM, Ms. Koren and I were inside the visitation room with
8 Ms. Garro Pinchi, when the ICE officers abruptly ended our visit, without disclosing where
9 they were taking Ms. Garro Pinchi next.

10 13. I was speaking to the other female detainee from that morning, in the same
11 visitation room where Ms. Koren was speaking with Ms. Garro Pinchi, and due to ICE’s
12 refusal to provide her direct access to counsel, I was forced to relay information to this
13 detainee’s counsel through my personal cell phone. It was in the midst of this informal legal
14 consultation, at approximately 2:40 pm that visitation was abruptly cut and both detainees were
15 forced to leave the room, without any information provided by ICE or security guards on
16 where they were going next.

17 14. Between the hours of approximately 10:30 am, and 2:40 pm, during intermittent
18 presence in the visitation room with Ms. Koren and Ms. Garro Pinchi, I witnessed multiple
19 signs of the serious psychological and physical impacts that Ms. Garro Pinchi suffered due to
20 her detention:

- 21 a. I witnessed her, from behind the glass, enter into heightened states of anxiety and
22 panic, including a period of approximately 20 minutes where she put her head
23 down on the table.

1 b. As time passed without access to her psychiatric medications, which she takes
2 every eight hours for anxiety and depression, she became increasingly and visibly
3 unwell, breaking out into sweats and bouts of hyperventilation.

4 c. Ms. Koren and I witnessed Ms. Garro Pinchi speak with a loved one via a call on
5 Ms. Koren's personal cell phone. Ms. Garro Pinchi expressed extreme distress
6 about how detention would impact her ability to provide for her daughter and
7 additional family members in Peru, who are completely dependent on her
8 financial support.
9

10 15. Shortly after this, at approximately 3:00 pm, I briefly left the building to print
11 documents. When I returned at approximately 3:20 pm, the building security guards refused
12 entry and told me that the building was closed for the day.
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15 I declare under penalty of perjury under the laws of the United States of America that the
16 foregoing is true and correct.

17 Executed on July 4, 2025.

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Matthew Bridges